

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
PERRY McCANTS : No. 21-13336-MDC

Debtor

ANSWER TO MOTION OF WSFS
FOR RELIEF FROM THE AUTOMATIC STAY AND CERTIFICATE OF SERVICE

The Debtor asks to be given a chance to get fully current and if there are any missed payments that they be included in the Amended Plan which Counsel will need to file in this case, and then remain current on all future payments.

WHEREFORE Debtor respectfully request this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 4/19/22

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer to Motion for Relief is being served served on Daniel Jones, Esq. By electronic mail and the Chapter 13 trustee.

/s/ David M. Offen
David M. Offen Esq.
Attorney for Debtor
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